

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

CHEVRON CORP.,

Plaintiff,

-against-

Case No. 1:12-mc-00065-LK-CFH

Hon. Lewis A. Kaplan

STEVEN DONZIGER, *et al.*,

Defendants.

**SUPPLEMENTAL DECLARATION OF MICHELLE HARRISON IN SUPPORT OF
MOTION OF NON-PARTY MOVANTS TO QUASH SUBPOENAS TO GOOGLE, INC.
AND YAHOO! INC. SEEKING IDENTITY AND EMAIL USAGE INFORMATION**

1. I, Michelle Harrison, have personal knowledge of all matters set forth in this declaration. If called upon to do so, I could and would testify to all matters set forth herein.

2. I am a law clerk with EarthRights International, counsel of record for Non-Party John Doe Movants.

3. EarthRights International and the Electronic Frontier Foundation represent the owners of the Microsoft email accounts simeontegel@hotmail.com, mey_1802@hotmail.com, pirancha@hotmail.com, and duruti@hotmail.com. The owner of duruti@hotmail.com joined the Non-Party John Doe Movants' motion to quash Chevron's subpoena to Microsoft on January 28, 2013.

4. My original declaration stated that we represent the owner of the email account lupitadeheredia@hotmail.com. In fact, that email address is not listed in Chevron's subpoena to Microsoft and therefore is not at issue in this case.

5. We also represent the owners of the following Google and Yahoo! email account addresses for the purpose of a separate motion to quash filed in the Northern District of

California: cortelyou@gmail.com, sayjay80@gmail.com, kevinkoenigquito@gmail.com, marialya@gmail.com, coldmtn@gmail.com, figer@gmail.com, bandawatch@gmail.com, catmongeon@gmail.com, briansethparker@gmail.com, lupitadeheredia@gmail.com, josephmutti@gmail.com, drewwoods3@gmail.com, katiafachgomez@gmail.com, tegelsimeon@gmail.com, lara_garr@gmail.com, richard.clapp@gmail.com, ampage@gmail.com, goldstein.ben@gmail.com, wilsonaguinda@gmail.com, sara.colon@gmail.com, farihahzaman@gmail.com, jeremylow@gmail.com and courtneyrwong@gmail.com, jenbilbao3@yahoo.com, kshuk22@yahoo.com, eriktmoe66@yahoo.com, drewwoods3@yahoo.com, lupitadeheredia@yahoo.com, and Lore_gamboa@yahoo.es.

6. I contacted a number of the email addresses listed in Chevron's subpoenas. In response, some of these email addresses sent messages back informing me that the message could not be delivered, indicating these addresses are no longer in use or no longer functional for other reasons. These addresses include alex_anchundia2007@hotmail.com, luisvillacreces@hotmail.com, aulestiajuan@hotmail.com, gaer69chzpr@hotmail.com, and hjploro@hotmail.com.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 31, 2013.



MICHELLE C. HARRISON